

EXHIBIT A

Brown, Harrison M.

From: Brown, Harrison M.
Sent: Thursday, March 25, 2021 8:17 AM
To: 'Burns, Justin'
Cc: Tagvoryan, Ana; Oberly, David; 'Hockstad, Karen'
Subject: RE: Philip Charvat v. Tomorrow Energy Corp., et al., NDOH Case No. 20-cv-01064

Hi Justin,

I should also note that this information is designated confidential pursuant to the terms of the protective order in this case.

Thanks,

--Harrison

Harrison Brown | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067
Office: 424.239.3400 | Direct: 424.239.3433 | Fax: 424.239.3398
hbrown@blankrome.com

From: Brown, Harrison M.
Sent: Thursday, March 25, 2021 8:14 AM
To: 'Burns, Justin' <Justin.Burns@DINSMORE.COM>
Cc: Tagvoryan, Ana <ATagvoryan@BlankRome.com>; Oberly, David <DOberly@BlankRome.com>; 'Hockstad, Karen' <Karen.Hockstad@DINSMORE.COM>
Subject: RE: Philip Charvat v. Tomorrow Energy Corp., et al., NDOH Case No. 20-cv-01064

Hi Justin,

Thanks for your patience while we looked at this. We had previously discussed, including with your colleague Joseph, providing only details about the amount of fees charged by Blank Rome to Tomorrow Energy rather than copies of the actual invoices and documents. Attached, please find a chart summarizing the costs to-date for this matter through the end of the last month. The chart also includes amounts invoiced by Compliance, the Relativity vendor, which are attributable to the Charvat matter and the settlement amount with Mr. Charvat. Tomorrow Energy's agreement with Mr. Charvat permits Tomorrow Energy to disclose the settlement amount but not the terms of the agreement itself.

If you have any questions, let us know.

Thanks,

--Harrison

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From: Brown, Harrison M.

Sent: Tuesday, March 16, 2021 10:58 AM

To: 'Burns, Justin' <Justin.Burns@DINSMORE.COM>

Cc: Tagvoryan, Ana <ATagvoryan@BlankRome.com>; Oberly, David <DObert@BlankRome.com>; Hockstad, Karen <Karen.Hockstad@DINSMORE.COM>

Subject: RE: Philip Charvat v. Tomorrow Energy Corp., et al., NDOH Case No. 20-cv-01064

Justin:

Sorry, I did not see your email on Friday. We will review this and respond soon.

Thanks,

--Harrison

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From: Burns, Justin <Justin.Burns@DINSMORE.COM>

Sent: Friday, March 12, 2021 5:29 AM

To: Brown, Harrison M. <HBrown@blankrome.com>

Cc: Tagvoryan, Ana <ATagvoryan@BlankRome.com>; Oberly, David <DObert@BlankRome.com>; Hockstad, Karen <Karen.Hockstad@DINSMORE.COM>

Subject: Philip Charvat v. Tomorrow Energy Corp., et al., NDOH Case No. 20-cv-01064

Harrison:

Tomorrow Energy alleged that Vestra is liable for any “future settlement” and “liability” involving Plaintiff’s claims against Tomorrow Energy. [See, e.g., Countercl. Para. 48.] We saw that Plaintiff settled his claims against Tomorrow Energy. [Doc. Nos. 76, 90.] We have yet to receive documents (e.g., the settlement agreement and an email memorializing the agreement) and communications related to that settlement (responsive to at least Request for Production No. 3). We also have not received a recent supplementation to Tomorrow Energy’s past discovery responses regarding its attorneys’ fees demand (Interrogatory No. 5).

When can we expect Tomorrow Energy to produce this information?

Hope you’re doing well.

Best,

Justin Burns



Justin M. Burns

Associate

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